

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF WISCONSIN

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TYLER HOLTE,

Plaintiff,

CASE NO. 20-CV-131

v.

CITY OF EAU CLAIRE,  
and HUNTER BRAATZ  
(in his individual capacity),

Defendants.

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**DEFENDANTS' PROPOSED *VOIR DIRE***

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The City of Eau Claire and Hunter Braatz, by and through their attorneys, MUNICIPAL LAW & LITIGATION GROUP, S.C., respectfully submit the following additional voir dire questions to be asked in combination with the voir dire questions given by the Court as a matter of course.

1. Raise your hand if you have a concern about being fair and impartial to the defendant, Hunter Braatz, a police officer who shot someone?
2. Do you have a negative image of police officers or law enforcement? If so, please explain.
3. Have you or any member of your family or close friend had any bad or negative experiences or encounters with a police officer? If so, please explain. Do you have any negative thoughts about how you or they were treated? Do you feel that this experience may affect your judgment?
4. Do you have strong opinions about police use of force against civilians?
5. Do you believe that if a police officer uses force against a civilian that the civilian deserves compensation, regardless of the evidence in the case?
6. Do any of you assume that because the Plaintiff has sued a police officer that the police officer must have done something wrong?

7. In this case, some of the witnesses and parties are police officers. Do you believe that police officers are less credible or less believable than any other person?
8. If you found that a police officer used force that was unreasonable, would you then automatically find that the officer must have acted with malice or in reckless disregard of a citizen's rights?
9. Have you read any articles or seen or heard any programs on radio, television, or the internet, that give you an unfavorable impression of police departments and police officers?
10. Have you participated in any "George Floyd," "Jacob Blake," "Black Lives Matter" or "Defund the Police" protests, or support any such efforts to defund or reform police departments or policing?
11. Did you watch the proceedings in the Derek Chauvin Trial on television?
12. Do you believe that people who file lawsuits are entitled to some compensation regardless of the evidence that is presented in the case?
13. Have you or any of your family members or close friends even been employed by or volunteered in any aspect of criminal defense work, including with a Public Defender's Office, a Legal Aid Officer, or with any type of support or advocacy group for those charged with or convicted of crimes?
14. In this case, the Plaintiff will go first in presenting evidence. Do you have a tendency to make quick judgments and not typically wait for all of the information to be provided? Can you promise to wait for all the evidence to be presented, wait for the judge's instructions, and not make up your mind until you go to the jury room and begin deliberations?

Dated this 16<sup>th</sup> day of July, 2021.

**MUNICIPAL LAW & LITIGATION GROUP, S.C.**

Attorneys for City of Eau Claire and Hunter Braatz.

By: /s/ Matteo Reginato

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